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Attorneys for Third Party Defendants,  
PROBUILDERS SPECIALTY INSURANCE  
COMPANY, RRG

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

CENTEX HOMES, a Nevada general  
partnership,

Plaintiffs,

vs.

ST. PAUL FIRE AND MARINE  
INSURANCE COMPANY, a Connecticut  
corporation; EVEREST NATIONAL  
INSURANCE COMPANY, a Delaware  
corporation; INTERSTATE FIRE &  
CASUALTY COMPANY, an Illinois  
corporation; LEXINGTON INSURANCE  
COMPANY, a Delaware corporation;  
FEDERAL INSURANCE COMPANY, an  
Indiana corporation,

Defendants.

ST. PAUL FIRE AND MARINE  
INSURANCE COMPANY,

Third Party Plaintiff,

vs.

UNDERWRITERS AT LLOYDS LONDON;  
PROBUILDERS SPECIALTY INSURANCE  
COMPANY, RRG; NEW HAMPSHIRE  
INSURANCE COMPANY; FIRST  
SPECIALTY INSURANCE COMPANY;  
ARCH SPECIALTY INSURANCE

CASE NO. 2:17-CV-02407-JAD-VCF

**STIPULATION AND [PROPOSED]  
ORDER EXTENDING TIME TO FILE A  
RESPONSIVE PLEADING TO ST. PAUL  
FIRE AND MARINE INSURANCE  
COMPANY'S THIRD PARTY  
COMPLAINT [FIRST REQUEST]**

Action Filed: 9/14/17  
Trial Date: None Set

COMPANY; IRONSHORE SPECIALTY  
INSURANCE COMPANY; ROCKHILL  
INSURANCE COMPANY; and FIREMAN'S  
FUND INSURANCE COMPANY,

Third Party Defendants.

AND RELATED CROSS-ACTIONS

Defendant and Third-Party Plaintiff ST. PAUL FIRE AND MARINE INSURANCE COMPANY ("St. Paul") and Third-Party Defendant PROBUILDERS SPECIALTY INSURANCE COMPANY RRG, A RISK RETENTION GROUP ("Probuilders") hereby agree and stipulate to extend the deadline for Probuilders to answer or otherwise respond to the Third-Party Complaint from January 11, 2018, to February 2, 2018. This is the first request to extend this particular deadline.

On November 13, 2017, St. Paul filed its Third-Party Complaint naming Probuilders and several other entities as defendants. ECF No. 38. The Summons and Complaint were served on Probuilders on December 21, 2017, via the Nevada Department of Business and Industry – Division of Insurance. ECF No. 58. Therefore, pursuant to Rule 12(a) of the Federal Rules of Civil Procedure, Probuilders' response to the Third- Party Complaint was originally due on January 11, 2018.

This extension of time is necessary because, due to now resolved conflict issues, counsel for Probuilders was only recently retained. Probuilders and St. Paul are currently attempting to resolve the claims raised by the Third-Party Complaint against Probuilders before incurring additional litigation costs. A case management order has not yet been entered, thus this stipulation to extend Probuilders' time to respond to the Third-Party Complaint will not affect any current deadlines in this action. This stipulation is entered into in good faith and is not intended to unduly delay the proceedings.

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1 Accordingly, the parties request that an order be entered extending the deadline for Probuilders to  
2 respond to the Third-Party Complaint from January 11, 2018, to February 2, 2018.

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4 DATED: January 24, 2018

**MORALES FIERRO & REEVES**

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6 By: s/s Ramiro Morales  
RAMIRO MORALES, ESQ.  
7 rmorales@mfrlegal.com  
Attorneys for Defendant and Third Party Plaintiff  
8 ST. PAUL FIRE and MARINE INSURANCE  
COMPANY  
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10 DATED: January 24, 2018

**WILSON ELSEER MOSKOWITZ EDELMAN &  
DICKER LLP**

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13 By: s/s John H. Podesta  
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Attorneys for Third Party Defendant  
15 PROBUILDERS SPECIALTY INSURANCE  
COMPANY, RRG  
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18 **ORDER**

19 **IT IS SO ORDERED.**

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21 UNITED STATES DISTRICT JUDGE

22 DATED: Magistrate

23 January 26, 2018  
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